IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA, Plaintiff, v. LI SHAOMING, MO HAILONG, also known as Robert Mo, WANG LEI, WANG HONGWEI, YE JIAN, LIN YONG, and MO YUN Defendants.	Case No. 4:13-CR-147 MOTION FOR LEAVE TO FILE UNDER SEAL

Defendant Mo Hailong requests leave of this Court to file under seal Exhibit B to the Declaration of Mark E. Weinhardt in Support of Mo Hailong's Motion to Compel Discovery. In support of his motion, Mr. Hailong states as follows:

1. Exhibit B to the Declaration of Mark E. Weinhardt in Support of Mo Hailong's Motion to Compel Discovery contains confidential information from FBI reports received during discovery.

2. Based on the government's standard discovery agreement (which does not exist in this case) the undersigned counsel is confident the government would agree with Exhibit B being filed under seal.

WHEREFORE, Defendant Mo Hailong prays this Court for an order granting his motion for leave to file Exhibit B under seal.

WEINHARDT & LOGAN, P.C.

By ______________________________

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ATTORNEYS FOR MO HAILONG, ALSO KNOWN AS ROBERT MO

PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon the parties to this action by serving a copy upon each of the attorneys listed below on Dec 15, 2014, by

- ☐ U.S. Mail
- ☐ FAX
- ☐ Hand Delivered
- ☐ Electronic Mail
- ☐ FedEx/ Overnight Carrier
- ☒ CM / ECF

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